

1 Mary E. McCutcheon (State Bar No. 099939)  
2 Erica Villanueva (State Bar No. 233148)  
3 Farella Braun & Martel LLP  
4 235 Montgomery Street, 30th Floor  
5 San Francisco, CA 94104  
6 Telephone: (415) 954-4400  
7 Facsimile: (415) 954-4480

5 Attorneys for Plaintiff  
6 CITY OF OAKLAND

7 Brian F. Zimmerman, Esq. (Bar No. 83095)  
8 ZIMMERMAN & KAHANOWITCH  
9 A Professional Corporation  
10 21650 Oxnard Street  
11 Suite 700  
12 Woodland Hills, California 91367  
13 Telephone: (818) 710-7777

14 Attorneys for Defendant, SPECIALTY NATIONAL  
15 INSURANCE COMPANY

16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**

18 CITY OF OAKLAND,

19 Case No. C 05 4981

20 Plaintiff,

21 **STIPULATION AND [PROPOSED]  
22 ORDER RE: REFERRAL TO PRIVATE  
23 MEDIATION**

24 vs.

25 SPECIALTY NATIONAL INSURANCE  
26 COMPANY,

27 Defendant.

28  
29 WHEREAS this matter was referred to the ADR Unit for mediation at the Case  
30 Management Conference held on March 9, 2006;

31 WHEREAS counsel for the parties have met and conferred regarding ADR and have  
32 reached the following stipulation pursuant to Civil L.R. 16-8 and ADR L.R. 3-5;

33 IT IS STIPULATED AS FOLLOWS:

34 1. The parties have agreed to participate in private mediation and have agreed that  
35 Bruce A. Edwards, Esq. of JAMS will serve as mediator;

36 STIPULATION AND [PROPOSED] ORDER  
37 RE: REFERRAL TO PRIVATE MEDIATION  
38 Case No. C 05 4981

2. The parties intend to participate in mediation with Mr. Edwards on or before July 3, 2006.

DATED: April 18, 2006

FARELLA BRAUN & MARTEL LLP

By: /s/  
Erica Villanueva

Attorneys for Plaintiff  
CITY OF OAKLAND

DATED: April 18, 2006

Law Offices  
ZIMMERMAN & KAHANOWITCH  
A Professional Corporation

By: /s/  
Brian E. Zimmerman

Attorneys for Defendant  
SPECIALTY NATIONAL INSURANCE  
COMPANY

~~PROPOSED~~ ORDER

Pursuant to the Stipulation above, the captioned matter is hereby referred to private mediation. The parties will participate in mediation by July 3, 2006.

IT IS SO ORDERED.

DATED: April 18, 2006



**HON. WILLIAM H. ALSUP  
United States District Court Judge**

STIPULATION AND [PROPOSED] ORDER  
RE: REFERRAL TO PRIVATE MEDIATION  
Case No. C 05 4981